

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STEVEN HILL)
580 Evergreen Court)
Lusby, Maryland 20657)
)
)
 Plaintiff,)
)
)
vs.) Case No. _____
)
FOOD LION, LLC.)
2110 Executive Boulevard)
Salisbury, North Carolina 28145)
)
SERVE ON:)
CSC-Lawyers Incorporating Service Co.)
7 St. Paul Street)
Suite 1660)
Baltimore, Maryland 21202)
)
 Defendant.)
)

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Steven Hill, by undersigned counsel, hereby files this Complaint against Food Lion, LLC, Defendant herein, and alleges as follows:

I. JURISDICTION AND VENUE

1. Plaintiff invokes the jurisdiction of this Court pursuant 28 U.S.C. § 1332.
2. Venue is proper in this Court pursuant to 28 U.S.C. § 1331(a).
3. The amount in controversy herein exceeds the sum of \$75,000.00, exclusive of interest and costs.

II. PARTIES

4. Steven Hill ("Hill") is a citizen of the State of Maryland with a residence in Calvert County at 580 Evergreen Court, Lusby, Maryland 20657.

5. Food Lion, LLC ("FLLLC") is a North Carolina based company with its principal place of business located at 2110 Executive Drive, Salisbury, North Carolina 28147. At all times relevant to this Complaint, Food Lion, LLC operated the store located at 210 H G Trueman Road, Lusby, Maryland 206571.

III. FACTS

7. On or about August 12, 2016, at approximately 11:30 a.m., Hill entered the Food Lion grocery store located at the property known as 210 H G Trueman Road, Lusby, Maryland 20657.

8. As Hill was walking through the Food Lion he slipped on liquid located on the floor which caused him to fall to the ground and sustain profound and painful injuries to his back, neck, and body. As a result of the injuries sustained, Hill was forced to incur substantial medical bills. As of the date of the filing of this Complaint, Hill is still experiencing pain and discomfort as a result of the injuries he sustained on August 12, 2016 and may be in need of future medical care.

9. At all times prior to his fall, Hill maintained a proper and vigilant outlook as he walked through the store and his actions in no way contributed to his fall. To the contrary, Hill's injuries

were solely the result of the unreasonable acts and omissions of Defendants, FLLLC.

10. Prior to this accident, FLLLC knew or should have known that liquid had accumulated on the floor of the Food Lion where Hill fell. Notwithstanding said knowledge and notice, FLLLC failed to take reasonable actions to prevent and/or cure the hazardous conditions which it knew or should have known could result in injuries to its customers. Additionally, FLLLC failed to provide any sort of meaningful warning to Hill, or others on the premises, of the dangerous accumulation of liquid on the floor of the store.

COUNT I
(Negligence)

11. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1-10.

12. FLLLC, at all times material to this Complaint, was in exclusive, possession, custody and control of the Food Lion located at the property known as 210 H G Trueman Road, Lusby, Maryland 206571. As such, FLLLC owed a duty to Hill, and all patrons who were lawfully on the premises, to provide safe pathways through the store free from the dangerous accumulation of liquid on the floor and/or other defects which could cause injury. FLLLC also had a duty to warn Hill, and all other patrons lawfully entering onto the property, of any defects, dangers or other hazardous conditions which existed on the property.

13. On or about August 12, 2016, FLLC breached the duties of care it owed to Hill by (1) failing to take reasonable actions to ensure that the floors of the premises were free from the dangerous accumulation of liquid, and (2) failing to warn Hill, and other patrons lawfully on the premises, of the aforementioned dangerous conditions of which it knew or should have known existed as of the time of Hill's accident.

14. As a result of FLLC's breaches of the duties of care owed to Hill, Hill sustained substantial damages.

WHEREFORE, Plaintiff, Steven Hill, prays that the Court enter judgment in his favor and against Defendant, Food Lion, LLC, for compensatory damages in excess of \$75,000.00, with the exact amount to be determined at trial, plus pre-judgment interest, costs, and such other and further relief as justice may require.

Respectfully submitted,



Thomas C. Costello (Fed. Bar No. 22978)
Matthew T. Holley (Fed Bar No. 19001)
Costello Law Group
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Suite 410
Towson, Maryland 21204
(410) 832-8800

Attorneys for Plaintiff,
Steven Hill

JURY TRIAL DEMANDED

Plaintiff hereby demands and request that all claims, actions and causes of action set forth herein be tried before a jury.



Matthew T. Holley

A handwritten signature in black ink, appearing to read "Matthew T. Holley". The signature is fluid and cursive, with a horizontal line extending from the end of the name towards the right.